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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF TEUTA FANI IN  
SUPPORT OF PARTIES' OMNIBUS  
SEALING STIPULATION RE: MOTION  
FOR AN AWARD OF ATTORNEYS'  
FEES, COSTS, AND SERVICE AWARDS**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Teuta Fani, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for  
3 Defendant Google LLC (“Google”) in this action. I make this declaration of my own personal,  
4 firsthand knowledge, and if called and sworn as a witness, I could and would testify competently  
5 thereto. Pursuant to Civil Local Rule 79-5 and Judge Yvonne Gonzalez Rogers’ May 6, 2024,  
6 Standing Order in Civil Cases (the “Standing Order”), I submit this declaration in support of the  
7 Omnibus Sealing Stipulation regarding Dkts. 1107, 1108, 1112, 1114 and 1115.

8 2. On April 23, 2024, Plaintiffs filed an Administrative Motion to File Under Seal  
9 Portions of their Motion for an Award of Attorneys’ Fees, Costs, and Service Awards and supporting  
10 papers (“Plaintiffs’ Motion”). Dkts. 1107 – 1107-23. On April 24, 2024, I received unredacted  
11 service copies of the documents sought to be sealed.

12 3. On April 30, 2024, my colleague, Joseph Margolies, filed a declaration in support of  
13 Plaintiffs’ Motion, describing the basis for sealing certain portions of Plaintiffs’ Motion for an  
14 Award of Attorneys’ Fees, Costs, and Service Awards and supporting papers and unsealing other  
15 portions. (Dkt. 1108 – 1108-5).

16 4. On June 7, 2024, Google filed an Administrative Motion to File Under Seal Portions  
17 of Google’s Opposition to Plaintiffs’ Motion for an Award of Attorneys’ Fees, Costs, and Service  
18 Awards and supporting papers (“Google’s Opposition”). Dkts. 1112 – 1112-31. That same day,  
19 Google provided unredacted service copies of the documents sought to be sealed to Plaintiffs.

20 5. On June 21, 2024, Plaintiffs filed a Temporary Sealing Motion re: Reply ISO Motion  
21 for an Award of Attorneys’ Fees, Costs and Service Awards (Plaintiffs’ Reply”). Dkts. 1115 – 1115-  
22 22. That same day, I received unredacted service copies of the documents sought to be sealed.

23 6. I have reviewed Plaintiffs’ Motion, Google’s Opposition, and Plaintiffs’ Reply, and  
24 based on my review, there is good cause to seal the following information, for the reasons identified  
25 in the table below:

| Document(s) to be Sealed   | Basis for Sealing  |
|--|--|
| Motion for an Award of Attorneys’ Fees, Costs, and Service Awards (Dkt. 1107-1/1108-2) | The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal financial analysis |

| Document(s) to be Sealed   | Basis for Sealing  |
|--|--|
| <p>Pages 23:9–10, 23:19</p>  | <p>and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products. The Court has already ordered substantially identical material sealed. <i>See</i> Dkt. 804 at 15 (sealing portions of the Lasinski expert report and appendices).</p>  |
| <p>Exhibit 6 to Mao Declaration –<br/>GOOG-BRWN-00406065 (Dkt.<br/>1107-9/1108-3)</p> <p>Portions of pages: -6065–6069</p> | <p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal project names, functionalities, and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p> |
| <p>Exhibit 7 to Mao Declaration –<br/>GOOG-CABR-03827263 (Dkt.<br/>1107-10/1108-4)</p> <p>Portions of page: -263</p>       | <p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal project names, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls</p>  |

| Document(s) to be Sealed  | Basis for Sealing   |
|---|---|
|   | within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.   |
| <p data-bbox="277 564 670 632">Exhibit 11 to Mao Declaration (Dkt. 1107-14/1108-5)</p> <p data-bbox="277 674 670 779">Pages: 7:6–7, 7:10, 9:22, 12:3, 12:5–6, 12:8, 12:11–12,13:23, 15:10, 26:9, 26:19</p>                  | <p data-bbox="751 564 1516 1249">The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details of Google’s internal data storage infrastructure, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>                |
| <p data-bbox="277 1262 727 1402">Google LLC’s Opposition to Plaintiffs’ Motion for an Award of Attorneys’ Fees, Costs, and Service Awards (Dkt. 1112-1)</p> <p data-bbox="277 1444 618 1476">Page 8:1-2, 19:19-20, 20:7</p> | <p data-bbox="751 1262 1516 1936">The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal financial analysis and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products. The Court has already</p> |

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|   | ordered substantially identical material sealed. <i>See</i> Dkt. 804 at 15 (sealing portions of the Lasinski expert report and appendices).  |
| Exhibit 9 to Broome Declaration (Dkt. 1112-11)<br><br>Pages 17:1, 17:4-5, 17:16, 19:1 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.       |
| Exhibit 13 to Broome Declaration (Dkt. 1112-15)<br><br>Pages 94:3, 94:8, 94:12, 95:22 | The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal project names, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. |
| Exhibit 14 to Broome Declaration (Dkt. 1112-16)<br><br>Page 415:21                    | The information requested to be sealed contains Google's highly confidential and commercially sensitive internal revenue information, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's  |

| Document(s) to be Sealed  | Basis for Sealing  |
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|   | internal metrics and financial data, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products.  |
| Exhibit 18 to Broome Declaration (Dkt. 1112-20)<br><br>Portions of pages 2, 4-22, 25-36   | The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including various types of related Google’s internal projects, internal detection bits, data sources and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products. |
| Declaration of Benjamin Kornacki In Support of Google LLC’s Opposition to Plaintiffs’ Motion for an Award of Attorneys’ Fees, Costs, and Service Awards (Dkt. 1112-31)<br><br>Pages 2:12, 2:15-19, 3:21, 4:25-26, 5:2, 5:12 | The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal detection bits, and logs, as well as internal metrics that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.  |



| Document(s) to be Sealed   | Basis for Sealing  |
|--|--|
| <p>Plaintiffs' Reply ISO Motion for an Award of Attorneys' Fees, Costs, and Service Awards (Dkt. Nos. 1115-01, 1115-02)</p> <p>Pages 5:24, 8:14-15</p> | <p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal logs and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p> |

7. Google's request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly confidential or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California on July 5, 2024.

By           /s/ Teuta Fani            
Teuta Fani